

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FT. LAUDERDALE DIVISION**

**CASE NO. 0:25-cv-61142-RS**

KATHLEEN HEIDECK,  
Plaintiff,

v.

MOMNT SERVICING COMPANY LLC;  
ALCO WINDOWS AND DOORS LLC;  
CROSS RIVER BANK; TRANS UNION LLC;  
and EXPERIAN INFORMATION  
SOLUTIONS, INC.;

Defendants. /

**DEFENDANT TRANS UNION LLC'S  
ANSWER AND DEFENSES TO PLAINTIFF'S COMPLAINT**

COMES NOW, Trans Union LLC ("Trans Union"), one of the Defendants herein, and files its Answer and Defenses to the Complaint ("Complaint") filed by Kathleen Heideck ("Plaintiff"). The paragraph numbers below correspond to the paragraph numbers contained in the Plaintiff's Complaint to the extent possible.

**JURISDICTION AND VENUE**

1. Trans Union admits only that Plaintiff has asserted claims pursuant to the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. ("FCRA"). Trans Union denies the remaining allegations contained in paragraph 1 of the Complaint.

2. Trans Union admits that jurisdiction is proper in this Court.

3. Trans Union states that the allegations of this paragraph are legal conclusions and, so stating, denies them.

### **PARTIES**

4. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 4 of the Complaint and, therefore, denies same.

5. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Complaint and, therefore, denies same.

4. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 4 of the Complaint and, therefore, denies same.

6. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of the Complaint and, therefore, denies same.

7. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the Complaint and, therefore, denies same.

8. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the Complaint and, therefore, denies same.

9. Trans Union admits that it is a limited liability company organized under the laws of the State of Delaware with its principal place of business located in Chicago, Illinois. Trans Union denies the remaining allegations contained in paragraph 9 of the Complaint.

### **FACTUAL ALLEGATIONS**

10. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Complaint and, therefore, denies same.

11. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of the Complaint and, therefore, denies same.

12. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of the Complaint and, therefore, denies same.

13. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 of the Complaint and, therefore, denies same.

14. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 14 of the Complaint and, therefore, denies same.

15. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 15 of the Complaint and, therefore, denies same.

16. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 16 of the Complaint and, therefore, denies same.

17. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 17 of the Complaint and, therefore, denies same.

18. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 18 of the Complaint and, therefore, denies same.

19. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 19 of the Complaint and, therefore, denies same.

20. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 20 of the Complaint and, therefore, denies same.

21. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 21 of the Complaint and, therefore, denies same.

22. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 22 of the Complaint and, therefore, denies same.

23. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 23 of the Complaint and, therefore, denies same.

24. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 24 of the Complaint and, therefore, denies same.

25. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 25 of the Complaint and, therefore, denies same.

26. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26 of the Complaint and, therefore, denies same.

27. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 27 of the Complaint and, therefore, denies same.

28. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 28 of the Complaint and, therefore, denies same.

29. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 29 of the Complaint and, therefore, denies same.

30. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 30 of the Complaint and, therefore, denies same.

31. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 31 of the Complaint and, therefore, denies same.

32. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 32 of the Complaint and, therefore, denies same.

33. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 33 of the Complaint and, therefore, denies same.

34. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 34 of the Complaint and, therefore, denies same.

35. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 35 of the Complaint and, therefore, denies same.

36. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 36 of the Complaint and, therefore, denies same.

37. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 37 of the Complaint and, therefore, denies same.

38. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 38 of the Complaint and, therefore, denies same.

39. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 39 of the Complaint and, therefore, denies same.

40. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of the Complaint and, therefore, denies same.

41. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of the Complaint and, therefore, denies same.

42. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 42 of the Complaint and, therefore, denies same.

43. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 43 of the Complaint and, therefore, denies same.

44. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 44 of the Complaint and, therefore, denies same.

**COUNT I ALCO'S VIOLATION OF THE FLORIDA DECEPTIVE  
AND UNFAIR TRADE PRACTICES ACT § 501.204(1)**

45. Trans Union admits that Plaintiff is a natural person and “a consumer” as defined by Florida Statute § 201.203(7). Trans Union is without knowledge or information sufficient to

form a belief as to the truth of the allegations contained in paragraph 45 of the Complaint and, therefore, denies same.

46. The provisions of the Fla. Stat. Ann § 501.203(8) are self-evident and speak for themselves. Trans Union denies the allegations contained in paragraph 46 of the Complaint.

47. The provisions of the Fla. Stat. § 501.204(1) are self-evident and speak for themselves. Trans Union denies the allegations contained in paragraph 46 of the Complaint.

48. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 48 of the Complaint and, therefore, denies same.

49. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 49 of the Complaint and, therefore, denies same.

50. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 50 of the Complaint and, therefore, denies same.

51. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 51 of the Complaint and, therefore, denies same.

52. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 52 of the Complaint and, therefore, denies same.

53. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 53 of the Complaint and, therefore, denies same.

54. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 54 of the Complaint and, therefore, denies same.

55. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 55 of the Complaint and, therefore, denies same.

56. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 56 of the Complaint and, therefore, denies same.

57. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 57 of the Complaint and, therefore, denies same.

**COUNT II AS TO DECLARATORY JUDGMENT UNDER  
28 USC § 2201(a) AGAINST ALCO**

58. The provisions of the 28 USC § 2201(a) and case law interpreting it are self-evident and speak for themselves. Trans Union denies the allegations contained in paragraph 58 of the Complaint.

59. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 59 of the Complaint and, therefore, denies same.

60. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 60 of the Complaint and, therefore, denies same.

61. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 61 of the Complaint and, therefore, denies same.

62. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 62 of the Complaint and, therefore, denies same.

63. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 63 of the Complaint and, therefore, denies same.

**COUNT III AS TO ALCO'S FRAUD**

64. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 64 of the Complaint and, therefore, denies same.

65. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 65 of the Complaint and, therefore, denies same.

66. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 66 of the Complaint and, therefore, denies same.

67. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 67 of the Complaint and, therefore, denies same.

68. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 68 of the Complaint and, therefore, denies same.

69. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 69 of the Complaint and, therefore, denies same.

70. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 70 of the Complaint and, therefore, denies same.

71. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 71 of the Complaint and, therefore, denies same.

**COUNT III [sic] AS TO MOMNT'S VICARIOUS LIABILITY FOR ALCO**

72. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 72 of the Complaint and, therefore, denies same.

73. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 73 of the Complaint and, therefore, denies same.

74. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 74 of the Complaint and, therefore, denies same.

75. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 75 of the Complaint and, therefore, denies same.

76. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 76 of the Complaint and, therefore, denies same.



77. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 77 of the Complaint and, therefore, denies same.

78. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 78 of the Complaint and, therefore, denies same.

79. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 79 of the Complaint and, therefore, denies same.

80. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of the Complaint and, therefore, denies same.

81. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 81 of the Complaint and, therefore, denies same.

82. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 82 of the Complaint and, therefore, denies same.

83. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 83 of the Complaint and, therefore, denies same.

84. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 84 of the Complaint and, therefore, denies same.

85. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 85 of the Complaint and, therefore, denies same.

**COUNT IV MOMNT'S VIOLATION OF THE  
FLORIDA DECEPTIVE AND UNFAIR TRADE PRACTICES ACT § 501.204(1)**

86. Trans Union admits that Plaintiff is a natural person and “a consumer” as defined by Florida Statute § 501.203(7). Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 86 of the Complaint and, therefore, denies same.

87. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 87 of the Complaint and, therefore, denies same.

88. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 88 of the Complaint and, therefore, denies same.

89. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 89 of the Complaint and, therefore, denies same.

90. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 90 of the Complaint and, therefore, denies same.

91. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 91 of the Complaint and, therefore, denies same.

92. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 92 of the Complaint and, therefore, denies same.

93. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 93 of the Complaint and, therefore, denies same.

94. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 94 of the Complaint and, therefore, denies same.

95. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 95 of the Complaint and, therefore, denies same.

96. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 96 of the Complaint and, therefore, denies same.

97. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 97 of the Complaint and, therefore, denies same.

98. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 98 of the Complaint and, therefore, denies same.

99. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 99 of the Complaint and, therefore, denies same.

**COUNT V AS TO MOMNT'S VIOLATION OF THE  
FAIR CREDIT REPORTING ACT 15 U.S.C. § 1681s-2(b)**

100. Trans Union admits that Plaintiff is a natural person and “a consumer” as defined by 15 U.S.C. § 1681a(c). Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 100 of the Complaint and, therefore, denies same.

101. Trans Union admits the allegations contained in paragraph 101 of the Complaint.

102. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 102 of the Complaint and, therefore, denies same.

103. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 103 of the Complaint and, therefore, denies same.

104. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 104 of the Complaint and, therefore, denies same.

105. The provisions of the FCRA and case law interpreting it are self-evident and speak for themselves. Trans Union denies the allegations contained in paragraph 105 of the Complaint. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 105 of the Complaint and, therefore, denies same.

106. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 106 of the Complaint and, therefore, denies same.

107. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 107 of the Complaint and, therefore, denies same.

108. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 108 of the Complaint and, therefore, denies same.

109. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 109 of the Complaint and, therefore, denies same.

110. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 110 of the Complaint and, therefore, denies same.

111. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 111 of the Complaint and, therefore, denies same.

112. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 112 of the Complaint and, therefore, denies same.

113. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 113 of the Complaint and, therefore, denies same.

114. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 114 of the Complaint and, therefore, denies same.

115. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 115 of the Complaint and, therefore, denies same.

**COUNT VI AS TO EXPERIAN'S VIOLATION OF THE FAIR  
CREDIT REPORTING ACT 15 U.S.C. § 1681i**

116. Trans Union admits that Plaintiff is a natural person and “a consumer” as defined by 15 U.S.C. § 1681a(c). Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 116 of the Complaint and, therefore, denies same.

117. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 117 of the Complaint and, therefore, denies same.

118. The provisions of the FCRA and case law interpreting it are self-evident and speak for themselves. Trans Union denies the allegations contained in paragraph 118 of the Complaint.

119. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 119 of the Complaint and, therefore, denies same.

120. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 120 of the Complaint and, therefore, denies same.

121. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 121 of the Complaint and, therefore, denies same.

122. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 122 of the Complaint and, therefore, denies same.

123. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 123 of the Complaint and, therefore, denies same.

124. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 124 of the Complaint and, therefore, denies same.

125. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 125 of the Complaint and, therefore, denies same.

126. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 126 of the Complaint and, therefore, denies same.

127. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 127 of the Complaint and, therefore, denies same.

128. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 128 of the Complaint and, therefore, denies same.

129. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 129 of the Complaint and, therefore, denies same.

130. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 130 of the Complaint and, therefore, denies same.

131. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 131 of the Complaint and, therefore, denies same.

**COUNT VII AS TO TRANS UNION'S VIOLATION OF THE FAIR  
CREDIT REPORTING ACT 15 U.S.C. § 1681i**

132. Trans Union admits that Plaintiff is a natural person and “a consumer” as defined by 15 U.S.C. § 1681a(c). Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 132 of the Complaint and, therefore, denies same.

133. Trans Union admits that it is a “consumer reporting agency” as defined by applicable law. Trans Union also admits that it assembles consumer credit information for the

purpose of furnishing consumer reports to third parties. Trans Union denies the remaining allegations contained in paragraph 133 of the Complaint.

134. The provisions of the FCRA and case law interpreting it are self-evident and speak for themselves. Trans Union denies the allegations contained in paragraph 134 of the Complaint.

135. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 135 of the Complaint and, therefore, denies same.

136. The provisions of the FCRA and case law interpreting it are self-evident and speak for themselves. Trans Union denies the allegations contained in paragraph 136 of the Complaint. Trans Union denies that it violated the FCRA (or any other law).

137. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 137 of the Complaint and, therefore, denies same. Trans Union denies that it violated the FCRA (or any other law).

138. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 138 of the Complaint and, therefore, denies same.

139. Trans Union denies the allegations contained in paragraph 139 of the Complaint.

140. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 140 of the Complaint and, therefore, denies same. Trans Union denies that it violated the FCRA (or any other law).

141. Trans Union denies the allegations contained in paragraph 141 of the Complaint.

142. Trans Union denies the allegations contained in paragraph 142 of the Complaint.

143. Trans Union denies the allegations contained in paragraph 143 of the Complaint.



144. Trans Union denies the allegations contained in paragraph 144 of the Complaint.

145. Trans Union denies the allegations contained in paragraph 145 of the Complaint.

146. Trans Union denies the allegations contained in paragraph 146 of the Complaint.

**COUNT VIII DECLARATORY JUDGMENT UNDER  
28 U.S.C. § 2201(a) AGAINST CROSS RIVER BANK**

147. The provisions of the 28 USC § 2201(a) are self-evident and speak for themselves.

Trans Union denies the allegations contained in paragraph 147 of the Complaint.

148. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 148 of the Complaint and, therefore, denies same.

149. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 149 of the Complaint and, therefore, denies same.

150. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 150 of the Complaint and, therefore, denies same.

151. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 151 of the Complaint and, therefore, denies same.

152. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 152 of the Complaint and, therefore, denies same.

153. Trans Union is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 153 of the Complaint and, therefore, denies same.

### **Relief Requested**

Trans Union denies that Plaintiff is entitled to any damages, costs, fees or other relief from or against Trans Union.

### **DEFENSES**

1. Without admitting it has a burden of proof on the issue, at all relevant times, Trans Union maintained and followed reasonable procedures to avoid violations of the FCRA and assure maximum possible accuracy of the information concerning Plaintiff in preparing consumer reports related to Plaintiff.

2. Any alleged damages to Plaintiff, which Trans Union continues to deny, are the result of the acts or omissions of Plaintiff or others, over whom Trans Union has no control and for whom Trans Union has no responsibility.

3. Trans Union, in compliance with the FCRA, reasonably and completely reinvestigated and verified, updated, or removed all information disputed by Plaintiff.

4. Trans Union at all times acted in compliance with the FCRA.

5. Trans Union has not published any false, inaccurate or defamatory information to a third-party regarding Plaintiff and has not acted with negligence, malice, actual malice, or willful intent to injure.

6. Plaintiff's claims for exemplary or punitive damages and the FCRA damage model violate the Due Process Clause of the Fourteenth Amendment and the laws of the State of Florida.

7. In the event that a settlement is reached between Plaintiff and any other party, Defendant Trans Union is entitled to any settlement credits permitted by law.

8. Any alleged damages to Plaintiff, which Trans Union continues to deny, were caused in whole or in part by an intervening or superseding cause.

9. Plaintiff lacks standing to assert the claims alleged in this action against Trans Union.

WHEREFORE, PREMISES CONSIDERED, Defendant Trans Union LLC respectfully Requests that this Honorable Court deny the relief requested in Plaintiff's Complaint, dismiss the action in its entirety, grant Defendant its costs of suit and expenses incurred herein, including reasonable attorneys' fees, and for such other and further relief as the Court deems just.

Respectfully submitted,

/s/ Charlotte Long

Charlotte Long, Esq.

Florida Bar No. 0112517

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Trans Union, LLC

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Chicago, IL 60661

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***Counsel for Defendant Trans Union, LLC***

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7<sup>th</sup> day of July, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record.

/s/ Charlotte Long  
Charlotte Long, Esq.